

**US Department of Transportation
Docket Management System
Room Plaza 401
400 Seventh Street, NW
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Spirit Airlines offers the following in response to the SNPRM regarding the 16g passenger and Flight Attendant seat replacement program. Spirit would agree that the new proposal has the potential to enhance safety overall and would endorse the concept for both new production aircraft as well as for retrofitting the current fleets.

The replacement of Flight Attendant seats with an upgraded seat can certainly be managed within the four years allotted by the rule. The cabin passenger seat replacement can also be managed within the allotted fourteen years.

The four years granted, for all other passenger seat replacements, would also be acceptable as long as the cabin is undergoing a seat replacement program or a front cabin conversion, or even a partial interior upgrade. The mandate would certainly be acceptable to enforce upgraded 16g seats when several rows are being affected.

However, one aspect of this retrofit portion requires clarification with regard to its intent. The rule seems to mandate the upgrade for a seat or all seats in the aircraft when the replacement of a single seat or row occurs for any reason. Spirit Airlines would recommend that the rule exclude the following as a driver for this upgrade: the single seat or row requiring removal for maintenance or repairs should not be the driver for a consequence so costly and disruptive. Statistically, replacement for maintenance purposes does not happen enough to be a significant contributor to safety. But, the effect to airline inventory management and one-off type seat tracking is very significant and costly. These factors are relevant when considering the effect of the single row requirement to the airlines:

- **Airlines must purchase 16g single rows and determine station allocations and shipping**
- **Airlines must track the repair as a unique installation where ever a repair is made**
- **Airlines must re-tool for different seat cushion sizes / styles and for a unique size and type of seat cover**
- **Airlines must train on the different seat manuals , technology and repair techniques**

- Airlines must manage the different style or geometry of a single row or seat when installed and intermixed (a standout both in appearance and spacing within the cabin).

Spirit Airlines believes that single row / seat replacement for repairs, as criteria for an upgrade, would fail any reasonable cost-to- benefit test. Please consider this aspect and adopt this minor exclusion since it would have no material effect to the overall safety contribution of the rule.

Respectfully,

A handwritten signature in black ink, appearing to read "R Shellnutt", with a large, stylized "R" at the beginning.

**Rick Shellnutt
Senior Director, Engineering
Spirit Airlines, Inc**